

## Exhibit A

(Plaintiff's Initial Disclosures, Relevant Excerpts)

## Mission

- Providing students with the knowledge and skills needed to practice medicine in the 21st century.
- Helping students acquire the judgment and confidence necessary to become competent physicians.
- Motivating students to pursue knowledge outside the classroom, both during their tenure at St. Matthew's and throughout life.
- Creating an environment in which students and faculty interact with each other, patients, and the community with compassion and integrity.

## Credentials

- The World Health Organization lists St. Matthew's in the World Directory of Medical Schools (<http://www.who.int/hrh/wdms/en>)
- The Educational Commission for Foreign Medical Graduates officially recognizes St. Matthew's University School of Medicine ([www.ecfm.org](http://www.ecfm.org)).
- The Government of the Cayman Islands, B.W.I. has fully chartered SMU.
- The accrediting body for SMU is the Accreditation Commission on Colleges of Medicine (ACCM). The ACCM is recognized by the U.S. Department of Education's National Committee on Foreign Medical Education and Accreditation (NCFMEA) as providing accreditation for medical schools comparable to U.S. (<http://www.ed.gov/about/bdscomm/list/ncfmea.html>).
- For information on which foreign medical schools are eligible to participate in the FFEL Program, contact the Foreign Schools Team at the U.S. Department of Education. The Team's phone number is (202) 377-3168 and fax number is (202) 275-3486.
- The Canadian Department of Education has approved SMU's program of medical study for student financial aid.
- St. Matthew's is licensed by the Commission for Independent Education, Florida Department of Education (Florida license number 2634). Additional information regarding this institution may be obtained by contacting the Commission at 2650 Apalachee Parkway, Suite A, Tallahassee, FL 32301. The toll-free telephone number is 888-244-6684.

- Approved by the State of New York for unlimited clinical rotations and residencies. Please visit the New York State Education Department Office of the Professions' website at <http://www.op.nysed.gov/medforms.htm> to view the listing of approved schools.

## Affiliations

### SAINT JOSEPH'S COLLEGE OF MAINE

Through an affiliation with Saint Joseph's College of Maine, St. Matthew's students can earn a Master of Science in Health Services Administration (MSHSA) degree from SJC while they are completing the Doctor of Medicine (M.D.) degree with SMU.

The MSHSA program is an excellent complement to a medical degree. Training covers U.S. health care systems, organizational theory and behavior, health services administration, health care financial management, research methods, management information systems, ethical and legal perspectives, strategic management, health policy and politics, and three electives. Students who enroll in both programs gain invaluable skills to deal with managed health care in the United States.

Saint Joseph's College of Maine was founded by the Sisters of Mercy in 1912 and is accredited by the New England Association of Schools and Colleges. The 331-acre campus is 18 miles from Portland, Maine, on the shores of Sebago Lake. Information about Saint Joseph's College of Maine can be found at [www.sjcme.edu](http://www.sjcme.edu) or by contacting the International Program Coordinator, Donna Walters, at [dwalters@sjcme.edu](mailto:dwalters@sjcme.edu) or 1-800-752-5668 or 207-893-7829.

visit our website at [www.stmatthews.edu](http://www.stmatthews.edu)



# Basic Sciences Program

## BASIC SCIENCE OVERVIEW

The gross and microscopic structure and function of each organ system is presented in lecture format with clinical correlations. Laboratories provide visual reinforcement and give students the opportunity to develop the ability to make observations and hone analytical skills. Professors focus on how disease interrupts the normal function of organ systems and the therapy needed to treat these abnormal processes. Lectures, labs and small group formats reinforce analytical skills.

Students are required to complete 97 credit hours in Basic Sciences.

The first Semester courses are numbered MD 1—, second semester courses are numbered 2—, and so on. Each credit hour is equivalent to 15 contact hours. If a course is canceled, an appropriate course will be substituted. Any canceled course will be offered no later than the next academic year.

## FIRST YEAR COURSES

### Semester I

MD 110	Patient-Doctor Skills I	RNC
MD 132	Embryology	2 credits
MD 144	Histology and Cell Biology	5 credits
MD 168	Gross Anatomy	8 credits

### Semester II

MD 210	Patient-Doctor Skills II	RNC
MD 261	Neuroscience	6 credits
MD 265	Biostatistics & Epidemiology	2 credits
MD 266	Biochemistry and Nutrition	6 credits
MD 278	Physiology and Endocrinology	8 credits

### Semester III

MD 310	Patient-Doctor Skills III	2 credits
MD 340	Microbiology & Immunology	8 credits
MD 377	Pathology I	7 credits
MD 376	Introduction to Psychiatry & Ethics	6 credits

## SECOND YEAR COURSES

### Semester IV

MD 410	Patient-Doctor Skills IV	2 credits
MD 412	Genetics	2 credits
MD 477	Pharmacology	7 credits
MD 478	Pathology II	8 credits

### Semester V

MD 562	Clinical Therapeutics	2 credits
MD 582	Introduction to Clinical Medicine	18 credits

RNC=Required Non-Credit

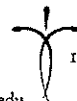


## SEMESTER I

### MD 110 Patient Doctor Skills I

#### Required Non-Credit

Patient-Doctor Skills I is the first in a series of required non-credit courses providing medical students from the beginning of their first semester onwards with a progressive introduction to the skills and attitude that are requisite in becoming competent compassionate physicians. In this first course, first semester students will come to appreciate the essential nature of a complete history. They will understand how the vast majority of patient presentations can be diagnosed with the information available in a competent history. They will gain experience in history taking and will be evaluated using the objective structured clinical examination (OSCE's) format.



visit our website at [www.stmatthews.edu](http://www.stmatthews.edu)

residency and fellowship programs that are accredited by the Accreditation Council for Graduate Medical Education (ACGME). To be certified by ECFMG, you must pass a series of exams; you must also fulfill ECFMG's medical education credential requirements. These requirements include providing ECFMG with copies of your medical diploma and your final medical school transcript (from a WHO listed school), which ECFMG will verify directly with the medical school. Please visit this site for updates and additional information:  
<http://www.ecfm.org>

SMU graduates participate in the National Resident Matching Program (NRMP) MATCH along with US Medical graduates thru the Electronic Residency Application Service (ERAS). Please visit this site for more information:  
<http://www.ecfm.org>

#### LICENSURE

Medical Licensure in the United States is governed by the individual state medical licensing authorities. It is strongly recommended that the students contact the authorities of any states where the student is interested in practicing. A complete list of contact information may be found at [www.aamc.org/members/gsa/cosr/medboardurls.htm](http://www.aamc.org/members/gsa/cosr/medboardurls.htm). Reasons for denial of medical licensure can include but are not limited to drug convictions, felonious conduct, and sexual misconduct.

Students who intend to practice medicine outside of the U.S. must meet the licensing requirements of the country in which they want to practice.



*Students enjoy the weather while studying on the Cayman campus.*

## *Standards of Professional Behavior and Academic Honesty*

#### UNIVERSITY DRESS CODE

As part of the student's training as a future physician, St. Matthew's University has established a culture and environment based on professional presentation and conduct. Consistent with its training objectives, the University has established a standard dress code for all students. This policy is designed to create a sense of professional decorum and respect with each student and between members of the University community, as well as to actively maintain a professional appearance within the community at large.

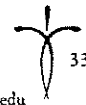
Throughout the class day and during specific University events, students are required to wear white shirts with standard white collars and tan or khaki colored long pants hemmed to the appropriate length. Knee length shorts are acceptable. Women students have the option of wearing tan or khaki colored skirts that must be of a tasteful length and appearance appropriate to a professional business environment. Footwear may include sandals but not thongs.

Violations of the dress code are handled through the Office of the Dean of Student Affairs.

#### STUDENT CONDUCT, ACADEMIC HONESTY, AND DISCIPLINARY PROCEDURES

Each student is expected to behave in a manner consistent with the University's mission as an educational institution. Behaviors judged unprofessional, unethical, dishonest, illegal, threatening or dangerous may be considered examples of misconduct. Specific examples of violations that fall under the purview of the University's disciplinary policies can be found in the Student Handbook.

Also included in the Student Handbook are Guidelines for Academic Honesty. The University expects all students to engage in academic pursuits in a manner that is above reproach.



Hello Bryan,  
 I understand that Dr. Nasser returned to the island on Saturday. He is in orientation this morning but this afternoon and the rest of the week he should be in his office. After reading Dr. McCutcheon's letter regarding your poor performance I must admit I can see his point. He reports that you transferred from Ross but apparently you didn't receive any transfer credits. I also notice you have borrowed approximately 90 thousand dollars while at SMU and perhaps more at Ross. This is a terrible situation. Your performance appeared to go along successfully until the fourth semester and then numerous withdrawals from courses and failures occurred. Perhaps you know why your performance went so bad. Perhaps this is what you said Dr. Nasser knew of. In any event I would think without his support and intervention that the decision will remain. A transfer to another institution to sort of get a new start might be your better option. Even if you were allowed back, failing a single credit for the next two and a half years would result in dismissal and this would be a significant pressure under which to perform.

Dr. Thornton

Jerry W. Thornton, Ph.D.  
 President  
 St. Matthew's University  
 School of Medicine  
 School of Veterinary Medicine  
 Grand Cayman  
 800-498-9700  
 Fax 407-977-9346

---

**From:** Bryan Repetto [mailto:brepetto@smucayman.com]  
**Sent:** Sunday, January 07, 2007 10:13 PM  
**To:** jthornton@smucayman.com  
**Subject:** FW: Brian Repetto Status At SMU  
**Importance:** High

Dr. Thornton,

This is the response I received from Dr. McCutcheon. Is there any other recourse I have and is there anyone else I can speak to regarding my situation? I feel there were factors that were not considered and I would like to speak to someone in regards to this decision.

Thank you for your time.

Bryan E. Repetto

---

**From:** Gary McCutcheon [mailto:gmcutcheon@smucayman.com]  
**Sent:** Friday, January 05, 2007 11:40 AM  
**To:** Bryan Repetto  
**Cc:** Dr. Gordon Green; jpringle; Janie Crews  
**Subject:** Re: Brian Repetto Status At SMU

Dear Mr. Repetto,

Per university policy, I have received your request to review your academic dismissal. Unfortunately, your request to reinstate you into SMU is denied for two specific reasons and for some general observations.  
 First...you have far exceeded the 24 failing hours that prompts dismissal. You have failed 30 hours. The most recent failing grades were 59 and 63 and both of these course were on second attempts..  
 Second...you have either withdrawn or failed Pathology II on three occasions. per the guidance published in the student handbook this alone is cause for dismissal.  
 General observations show that by current standards you would not have been admitted to SMU based on

1/29/2007

BR 00358

your weak undergraduate grades and you would not have been transferred from Ross with the poor performance at that institution. The combination of weak undergrad, weak performance at Ross, and 30 documented failing credits at St. Matthew's all speak to little likelihood that you will become a successful physician.

Your dismissal is reaffirmed.

I wish you well in future endeavors.

Dr. McCutcheon

Vice President of Operations

Dr. Gordon Green wrote:

Bryan

When I received your email yesterday, I forwarded it on to Dr. McCutcheon who should be contacting you soon.

Kind regards,

Gordon J Green MD FRCPC FAAP  
Chief Academic Officer  
St. Matthew's University

Bryan Repetto ([brepetto@smucayman.com](mailto:brepetto@smucayman.com)) wrote:

Dear Dr. Green,

I have made several attempts to contact Dr. Nasser via email, and have not received a response.

I have received a letter from the registrar informing me that I have been dismissed from St. Matthew's University. The letter advised me to contact Dr. Nasser regarding the grievance procedure and other options.

If at all possible, I would like to continue at St. Matthew's this coming semester. As I have stated in earlier emails, I do believe there are mitigating factors in my case. In the past two semesters, I have been among the students achieving the highest shelf exam scores in Pathology. In addition, I have served as a TA in patient doctor 4 for two semesters. This semester also yielded an improvement in my Pharmacology shelf exam score.

What can be done to facilitate readmission? What are the steps in the grievance procedure and how does the procedure work?

I would like to continue on with my studies at SMU as soon as possible. I am very concerned that a prolonged absence from medical education would cause me to lose much of the knowledge I have acquired in my time at SMU and would like one more opportunity to prove myself.

1/29/2007

BR 00359